

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Conditional Major draft permit No. F-03-035 R2

Monessen Hearth Systems

Paris, Kentucky

September 2, 2008

SAJJAD QUABILI, REVIEWER

SOURCE

I.D. #: 21-017-00030

SOURCE A.I. #: 37283

ACTIVITY #: APE20080001

**MINOR PERMIT REVISION: F-03-035 R2**

***APE20080001:***

On August 19, 2008, Monessen applied to the Division for a minor revision to their Conditional Major Air Quality Permit to construct three paint spray booths (EP 04, EP 12 and EP 13). The permit has been revised to reflect the following changes:

***EP 12, Paint Spray Booth:*** The spray booth (1C) and the cure oven (1D) of EP 01 will be relocated to EP 12 with new assigned numbers 12A and 12B, respectively. The capacity of the paint spraying applicator is 0.74 gallon per hour. Columbus Industries Supra II/Mini-Mesh paint Collector Pads are utilized to control particulates at the spray booth.

***EP 04, Paint Spray Booth:*** This dip paint spray booth will be replaced with a spray/dip booth. The capacity of the dip paint booth is 0.25 gal per hour. The capacity of the paint spray booth is 0.74 gallons per hour. Columbus Industries Supra II/Mini-Mesh paint Collector Pads are utilized to control particulates at the spray booth.

***EP 13, Paint Spray Booth:*** This paint spray booth will be installed to the plant. The capacity of the paint spraying applicator will be 0.74 gallon per hour. Columbus Industries Supra II/Mini-Mesh paint Collector Pads will be utilized to control particulates at the spray booth. The cure oven (1B) of EP 01 will be relocated to this emission point with a new assigned number, 13B.

**6/5/2006 OFF PERMIT CHANGE:**

In addition to above mentioned modifications, the Division has revised the permit to reflect the Section 502(b)(10) changes to the permit for an addition of an emission point (EP 11).

**COMMENTS:**

***Potential to emit:***

The potential to emit (PTE) hazardous and non hazardous regulated air pollutants was recalculated. The PTE indicated increment of HAP, VOC and PM/PM<sub>10</sub> emissions for the source because of the enhanced capacity of an emission point (EP 04) and the addition of an emission point (EP 13). The conditional major emission limitation for VOCs will remain less than 90 tons per year. The actual emission for VOCs was 20.82 tons per year for the year 2007. The conditional major emission limitations for single HAP and combined HAPs will remain unchanged at 9 tons per year and 22.5 tons per year, respectively. Federally-enforceable permit

for non-major source status for the facility will remain unchanged in the revised permit. The Division has determined that the revision to the permit is minor per 40 KAR 52:030, Section 14.

**Revision 1:**

**Log #56479**

Monessen has proposed to add two paint spray booths (EP#6 and EP #7) and five drying ovens (insignificant activity). This modification will not trigger any new regulation and the source wide emission limits will stay unchanged. Therefore, this addition is processed under 52:030, Section 14, minor permit revisions.

**SOURCE DESCRIPTION:**

Monessen Hearth Systems operates a fabricated metal-products manufacturing plant located at 149 Cleveland Drive, Paris. The paint operation consists of spray booths and dip painting machines. Exhaust filters are used to control particulate matter.

**PERMITTING BACKGROUND:**

The source has applied to the Division to renew their Conditional Permit (F-98-022, Revision 1) and also construct a spray booth (Ep#5).

**COMMENTS:**

The plant-wide allowable emission limits are as follow:

1. Single HAP emissions shall not exceed 9 tons per year.
2. Combined HAP emissions shall not exceed 22.5 tons per year.
3. VOC emissions shall not exceed 90 tons per year.

**APPLICABLE REGULATIONS:**

The source is subject to 401 KAR 59:010, New process operations for the particulate emitted.

**PERIODIC MONITORING:**

Compliance with annual allowable emission limits will be ensured by monitoring, record keeping and reporting specified in the permit.

The permittee shall keep calendar month records of the usage of coatings, solvents, and clean up solvents and any other VOC/HAP containing material. At the end of each month volatile organic compound (VOC) and hazardous air pollutants (HAPs) emissions shall be calculated and recorded. These records shall be summarized and tons per month VOC/HAP emissions calculated and recorded. Tons of VOC/HAP per 12 months shall be recorded. The recorded tons per 12 months shall be a 12 months rolling total representing the most recent year.

**OPERATIONAL FLEXIBILITY:**

Operational flexibility is allowed under the permit by not placing throughput or emissions limits on individual machines, but by placing all machines under a plant wide emissions cap (See Periodic Monitoring above).

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.